

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Schools and Libraries Universal Service Support Mechanism)	CC Docket No. 02-6
)	
Request for Review of a Decision of the Universal Service Administrator by the)	Application No. 171046688
)	
AAA Academy)	
)	
and)	
)	
Single Path, LLC)	

**JOINT REQUEST OF SINGLE PATH, LLC AND AAA ACADEMY FOR REVIEW OF A DECISION OF
THE UNIVERSAL SERVICE ADMINISTRATIVE COMPANY**

Pursuant to sections 54.719(b) and 54.722 of the Commission’s rules,¹ Single Path, LLC (“Single Path”) and AAA Academy (“Academy” and, together with Single Path, the “Parties”) hereby respectfully request that the Wireline Competition Bureau (Bureau) conduct a *de novo* review of this appeal of a funding reduction notice issued by the Schools and Libraries Division (“SLD”) of the Universal Service Administrative Company (“USAC”), through the issuance of a

¹ 47 C.F.R. § 54.719(b); 47 CFR § 54.722. The Academy’s Request for Review was denied by USAC as untimely because it was filed 20 days after the 60-day period established under Section 54.719(a) for appealing USAC’s issuance of the Form 486 Notification Letter had expired. To the extent that Section 54.719(a) filing deadline remains relevant to the Bureau’s consideration of this *de novo* Request for Review filed under Section 54.719(b), the Parties request a waiver of Section 54.719(a) of the Commission’s rules, 47 C.F.R. § 54.719(a). The Form 486 Notification Letter was issued on July 7, 2018, after the Academy had closed for the summer. The Academy received actual notice of the funding reduction when the school reopened in September 2018 and filed its Request for Review with USAC within a reasonable time thereafter. *See Requests for Review and/or Waiver of Decisions of the Universal Service Administrator by ABC Unified School District et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, DA 11-1332, 26 FCC Rcd 11019 (Wir. Comp. Bur. 2011) at ¶ 2 (waiving the appeal deadline where petitioners submitted their appeals to the Commission within a reasonable period of time after receiving actual notice of USAC’s adverse decision) (“*ABC Unified Order*”).

FY2017 Revised Funding Commitment Decision Letter (FY2017 RFCDL), dated October 8, 2018.² The Parties request that the Bureau direct USAC to accept the applicant's late-filed FY2017 Form 486 and increase its funding commitments funding for the subject requests to cover the full period for which the services were delivered, in accordance with the standard the Commission articulated in its *Archdiocese of New Orleans Order*.³

I. Background

In FY2017, Single Path was the Academy's chosen service provider for Internet Access (FRN 1799106494) and voice services (FRN 1799106546). Given the technical changes in the E-rate Program, the launch of the USAC EPC Portal, and ensuing confusion thereof, the Academy used an E-rate consultant to assist with their E-rate filings. On May 11, 2017, the Academy, with the assistance of its consultant, certified its Form 471, seeking \$20,142.00 in reimbursement for Internet access and \$3,654.00 in reimbursement for the phased down voice services.⁴ On July 8, 2017, USAC issued a positive Funding Commitment Decision Letter approving the requested amounts for both FRNs as submitted.

Because the Academy relied solely on its consultant for E-rate compliance filings and because the consultant was granted access to the EPC portal for the Academy to manage all of

² See Attachment A, FY2017 RFCDL.

³ *Requests for Waiver of Decisions of the Universal Service Administrator by Archdiocese of New Orleans, Louisiana et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 31 FCC Rcd 11747, para. 10 (WCB 2016) (*Archdiocese of New Orleans Order*). The Parties recognize that the Commission finds the FCC Form 486 Deadline to be procedural in nature and, thus, requires appeals to be filed in the first instance directly with USAC. See, e.g., *Request for Review of a Decision of the Universal Service Administrator by La Canada Unified School District; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 30 FCC Rcd 4729, 4729, para. 2 (WCB 2015) (*La Canada Unified School District Order*) (dismissing an appeal that properly belongs before USAC pursuant to Commission rules). As shown in Attachment A, USAC has rejected an appeal of this decision as untimely. Because the Form 486 filing deadline is established by USAC, no waiver of the Commission's rules or orders is necessary. See *Archdiocese of New Orleans Order* at ¶ 4, n.10.

⁴ Attachment B, FY2017 Form 471 for AAA Academy, dated May 11, 2017.

the notifications and filing requirements and advise them of any action that needed to be taken or deadlines, the Academy was not aware of having missed the Form 486 deadline. Unfortunately, the consultant provided unreliable E-rate support services to the Academy. Ultimately the consultant discontinued providing E-rate compliance services, leaving them with neither access to nor understanding of the EPC Portal. The impact of this resignation was further compounded by a change of personnel at the Academy responsible for E-rate. Once the Academy regained access to the EPC Portal, they struggled with understanding and locating any urgent reminders, if they were received, and did not understand the newsfeeds or the multiple errors that had ensued.

Under the E-rate rules, the FCC Form 486 was due 120 days after July 8, 2017. The Academy only became aware of this after the 120-day deadline had passed through communication from its service provider, Single Path, whereupon, the Academy immediately filed the Form 486 on April 19, 2018.⁵

Almost three months later, on July 7, 2018, USAC issued the FCC Form 486 Notification Letter informing the Academy of the 120-day rule violation and adjusting the approval service start date from July 1, 2017 to December 20, 2017.⁶ The Academy appealed this decision with USAC on September 25, 2018.⁷ On October 8, USAC issued the FY2017 RFCDL denying the appeal as untimely and without addressing the merits, and therefore maintained its earlier reduction in funding from the original 12 months to 7 months.⁸

⁵ Attachment C, AAA Academy FY2017 Form 486, dated Apr. 19, 2018.

⁶ Attachment D, USAC FCC Form 486 Notification Letter, dated July 7, 2018.

⁷ Attachment E, AAA Academy Appeal to USAC on 486 120-Day Violation, dated Sept. 25, 2018. Regrettably, this appeal was thus filed 20 days after the 60-day appeal deadline had passed.

⁸ See Attachment A, FY2017 RFCDL.

II. Discussion

In 2016, in light of the new invoice rules, the Commission revisited its standard for granting late-filed 486 appeals in the landmark *Alaska Gateway Order*.⁹ Specifically, the Commission clarified that “absent extraordinary circumstances, we will only grant relief for late-filed Forms 486 that were filed no later than 120 days after the last day to receive service for the funding request at issue and the applicants have demonstrated good cause for the late filing.”¹⁰

The Academy meets the revised standard established by the *Archdiocese of New Orleans Order*. *First*, the Academy filed its Form 486 on April 19, 2018. That date is well in advance of the ultimate deadline established in *Archdiocese of New Orleans*, which was 120 days after the last date to receive service (*i.e.*, for FY2017, 120 days after June 30, 2018).

Second, the Academy unquestionably faced extraordinary services in this case, akin to the loss or unavailability of a key employee with responsibility for E-rate matters. Here, having recognized its own lack of in-house knowledge and resources for managing the E-rate application and funding process, the Academy engaged the services of an E-rate consultant, which it entrusted to have the necessary expertise, commitment, and resources to carry the Academy through the entire funding process. Instead, at a critical moment, the loss of consultant resulted in the Academy not having an orderly transition, *i.e.*, the Academy did not receive a summary of the status of the E-rate funding process, next steps, or upcoming deadlines, and understanding of the EPC along with the login credentials. Unsurprisingly, the Academy was at a loss after the departure of the E-rate consultant, not having access or understanding of the

⁹ *Requests for Review and Waiver of the Decision of the Universal Service Administrator by Alaska Gateway School District et al; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 21 FCC Rcd 10182 (Wir. Comp. Bur. 2006), at ¶ 8 (“*Alaska Gateway Order*”)

¹⁰ *Archdiocese of New Orleans Order* at ¶ 10.

newly implemented portal and already in a tailspin from other misfiled or late-filed forms from earlier funding years.

Losing the consultant at that point was the equivalent of losing a key employee upon whom the Academy justifiably relied in seeking expert E-rate consulting advice and guidance.¹¹ Thus, the Bureau should consider the loss of the consultant as akin to circumstances in which it has previously waived E-rate deadlines, such as that for the Form 471. For example, in the *Academy of Math and Science Order*, the Commission granted a waiver of the Form 471 deadline where medical issues had prevented the timely filing of the form and the school had nevertheless filed it “close enough to the deadline so as not to impair the administration of the program.”¹² Here, in establishing the outer permissible boundary of the Form 486 late-filing period as 120 days after the last day to receive service, the Bureau has already determined that such timing is consistent with orderly administration of the E-rate mechanism.¹³

Nor is it consistent with precedent to require the Applicant to maintain on staff a fully-trained backup employee who is ready to step in on a moment’s notice in the event of the failure of the consultant to perform its duties. As the Commission explained in the *Acorn Public Library Order*, for example, “especially in small districts . . . , it would be an undue hardship to expect small applicants to train multiple staff members to handle E-rate filings in anticipation of

¹¹ See Public Notice, CC Docket No. 02-6, WC Docket No. 06-122, “Streamlined Resolution of Requests Related to Actions by the Universal Service Administrative Company,” DA 17-279, 32 FCC Rcd 1989 (Wir. Comp. Bur. 2017) at 3 (granting late-filed Form 486 waiver request as a result of change of personnel in Lexington County School District One, SC, Application No. 1051214).

¹² *Requests for Waiver and Review of Decisions of the Universal Service Administrator by Academy of Math and Science; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, FCC 10-122, 25 FCC Rcd 9256 (2010), at ¶ 9 (“*Academy of Math and Science Order*”).

¹³ *Archdiocese of New Orleans Order* at ¶ 10 (finding that this deadline does not “frustrate the timely submission and payment of invoices,” but rather “ensures that the invoicing process is not delayed by tardy FCC Forms 486”).

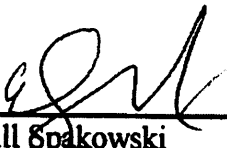
unexpected absences due to illness and death, unless such absences should have been foreseeable.”¹⁴ The sudden loss of a an entrusted consultant, even if not due to illness or death, is similarly impactful, in that it abruptly denies the applicant the benefit of assistance from the sole individual with E-rate expertise who is also knowledgeable regarding the status and posture of the applicant’s funding requests and filing requirements and deadlines.

III. Conclusion

For the foregoing reasons, the Parties respectfully request the Bureau to direct USAC to accept the applicant’s late-filed FY2017 Form 486 and increase its funding commitments funding for the subject requests to cover the full period for which the services were delivered, in accordance with the standard the Commission articulated in its *Archdiocese of New Orleans Order*.

¹⁴ *Requests for Waiver and Review of the Decisions of the Universal Service Administrator by Acorn Public Library, et al., Schools and Libraries Universal Service Support Mechanism*, File Nos. SLD-637819, *et al.*, CC Docket No. 02-6, Order, 23 FCC Rcd 15474, 15478 (Wireline Comp. Bur. 2008), at ¶ 8 (*Acorn Public Library Order*) (finding special circumstances exist to grant extra time for filing the Form 471, where petitioners were late due to circumstances beyond their control); *see also Requests for Waiver and Review of Decisions of the Universal Service Administrator by A Special Place; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order and Order on Reconsideration, 29 FCC Rcd 5827 (Wir. Comp. Bur. 2014), at ¶ 1; *ABC Unified Order* at ¶ 2 (waiving invoice deadline where it was missed due to circumstances beyond the applicants’ control)

Respectfully submitted,



Bill Spakowski
Director of Education
Single Path, LLC
905 Parkview Blvd.
Lombard, IL 60148

/s/

Freda McArthur
Executive Director
AAA Academy
13801 S. Chatham Avenue
Blue Island, IL 60406

December 6, 2018

ATTACHMENT A

Revised Funding Commitment Decision Letter

Funding Year 2017

Contact Information:

Freda McArthur
AAA ACADEMY
13801 S. CHATHAM AVE
BLUE ISLAND, IL 60406
fredamcarthur@aaaacademy.org

BEN: 16046483**Post Commitment Wave:** 30

Totals

Original Commitment Amount	\$23,796.72
Revised Commitment Amount	\$13,881.42

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2017 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

- Appeals
- Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

1. **File the FCC Form 486**, Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please review the CIPA requirements and file the form(s).



BEN Name: AAA ACADEMY
BEN: 16046483
Post Commitment Wave: 30

- o **If USAC approved funding on an FRN in your original FCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).
 - o **If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL**, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
- **If you (the applicant) are invoicing USAC:** You must pay your service provider(s) the full cost for the services you receive and file the [FCC Form 472](#), the Billed Entity Applicant Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - **If your service provider(s) is invoicing USAC:** The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the [FCC Form 474](#), the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs. Every funding year, service providers must file an [FCC Form 473](#), the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - **To receive an invoice deadline extension, the applicant or service provider** must request an extension on or before the last date to invoice. **If you anticipate, for any reason, that invoices cannot be filed on time**, USAC will grant a one-time, 120-day invoice deadline extension if timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- **To submit your appeal to USAC**, visit the Appeals section in the [E-rate Productivity Center \(EPC\)](#) and provide the required information. USAC will reply to your appeal submissions to confirm receipt. Visit USAC's [website](#) for additional information on submitting an appeal to USAC, including step-by-step instructions.
- **To request a waiver of the FCC's rules or appeal USAC's appeal decision**, please submit it to the FCC in proceeding number CC Docket No. 02-6 using the [Electronic Comment Filing System](#) (ECFS). Include your contact information, a statement that your filing is a waiver request,



BEN Name: AAA ACADEMY
BEN: 16046483
Post Commitment Wave: 30

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.



BEN Name: AAA ACADEMY

BEN: 16046483

Post Commitment Wave: 30

Revised Funding Commitment Decision Overview

Funding Year 2017

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1799106546	Single Path LLC	Appeals	\$2,131.92	Denied
1799106494	Single Path LLC	Appeals	\$11,749.50	Denied



BEN Name: AAA ACADEMY
BEN: 16046483
Post Commitment Wave: 30

Post Commitment Request Number: 123781	Post Commitment Request Type: Appeals	Post Commitment Decision: Denied
--------------------------------------------------	-------------------------------------------------	--------------------------------------------

FRN: 1799106546	Service Type: Voice	Original Status: Funded	Revised Status: Funded
FCC Form 471: 171046688			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	7		
Total Eligible Recurring Charges	\$7,106.40	Total Eligible One Time Charges	\$0.00
Total Pre-Discount Charges		\$7,106.40	
Discount Rate		30.00%	
Revised Committed Amount		\$2,131.92	

Dates		Service Provider and Contract Information	
Service Start Date	12/20/2017	Service Provider	Single Path LLC
Contract Expiration Date	6/30/2018	SPIN (498ID)	143030968
Contract Award Date		Contract Number	
Service Delivery Deadline	6/30/2018	Account Number	
Expiration Date (All Extensions)		Establishing FCC Form 470	170082132

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 9/25/2018. The FCC Form 486 Notification Letter was issued on 7/7/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.



BEN Name: AAA ACADEMY
BEN: 16046483
Post Commitment Wave: 30

Post Commitment Request Number: 123781	Post Commitment Request Type: Appeals	Post Commitment Decision: Denied
--------------------------------------------------	-------------------------------------------------	--------------------------------------------

FRN: 1799106494	Service Type: Data Transmission and/or Internet Access	Original Status: Funded	Revised Status: Funded
FCC Form 471: 171046688			

Dollars Committed			
Monthly Cost		One-Time Cost	
Months of Service	7		
Total Eligible Recurring Charges	\$13,055.00	Total Eligible One Time Charges	\$0.00
Total Pre-Discount Charges		\$13,055.00	
Discount Rate		90.00%	
Revised Committed Amount		\$11,749.50	

Dates		Service Provider and Contract Information	
Service Start Date	12/20/2017	Service Provider	Single Path LLC
Contract Expiration Date	6/30/2018	SPIN (498ID)	143030968
Contract Award Date		Contract Number	
Service Delivery Deadline	6/30/2018	Account Number	
Expiration Date (All Extensions)		Establishing FCC Form 470	170082132

Consultant Information	
Consultant Name	
Consultant's Employer	
CRN	

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

Our records show that your appeal was filed more than 60 days after the date your decision letter was issued. Your appeal was filed on 9/25/2018. The FCC Form 486 Notification Letter was issued on 7/7/2018. Federal Communications Commission (FCC) rules require appeals to be filed within 60 days of the date on the decision letter being appealed. FCC rules do not permit the Universal Service Administrative Company (USAC) to consider your appeal.

ATTACHMENT B



Description of Services Ordered and Certification Form 471

FCC Form 471

Application Information

Nickname	2017-2018 P1	Application Number	171046688
Funding Year	2017	Category of Service	Category 1

Billed Entity

AAA ACADEMY
13801 S. CHATHAM AVE BLUE ISLAND IL 60406
708-206-0000

Contact Information

Freda McArthur
708-206-0000
fredamcarthur@aaaacademy.org

Billed Entity Number 16046483
FCC Registration Number 0018090779
Applicant Type School

Consulting Firms

Name	Consultant Registration Number	City	State	Zip Code	Phone Number	Email
E Rate Solutions Group Inc	16043598	Colts Neck	NJ	7722	732-946-8300	kweiss@erategroup.com

Entity Information

School Entity - Details

BEN	Name	Urban/ Rural	State LEA ID	State School ID	NCES Code	Alternative Discount	School Attributes	Endowment
16046483	AAA ACADEMY	Urban				Survey	Private School	None

School Entity - Discount Rate Calculation Details

BEN	Name	Urban/ Rural	Number of Students	Students Count Based on Estimate	CEP Percentage
16046483	AAA ACADEMY	Urban	54	No	

Related Entity Information

Discount Rate

School Enrollment	School NSLP Count	School NSLP Percentage	School Urban/ Rural Status	Category One Discount Rate	Category Two Discount Rate	Voice Discount Rate
54	50	93.0%	Urban	90%	85%	30%

[Funding Request for FRN #1799106494](#)

Funding Request Nickname: Internet Access

Service Type: Data Transmission and/or Internet Access

Agreement Information - Month-to-Month

Establishing FCC Form 470 170082132

Account Number

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider Single Path LLC (SPN: 143030968)

How many bids were received for this contract? 3

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative Internet Access for Students and Staff

Line Item # 1799106494.001

Product and Service Details

Purpose

Function

Type of Connection

Bandwidth Speed

Internet access service that includes a connection from any applicant site directly to the Internet Service Provider

Fiber

Ethernet

Upload Speed

Download Speed

100.0 Mbps

100.0 Mbps

Connection Information

Does this include firewall services?

Is this a connection between eligible schools, libraries and NIFs (i.e., a connection that provides a “Wide area network”)?

Yes

Yes

Is this a direct connection to a single school, library or a NIF for Internet access?

No

Cost Calculation for FRN Line Item # 1799106494.001

Monthly Cost		One-Time Cost	
Monthly Recurring Unit Cost	\$1,865.00	One-time Unit Cost	\$0.00
Monthly Recurring Unit Ineligible Costs	- \$0.00	One-time Ineligible Unit Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$1,865.00	One-time Eligible Unit Cost	= \$0.00
Monthly Quantity	x 1	One-time Quantity	x 0
Total Monthly Eligible Recurring Costs	= \$1,865.00	Total Eligible One-time Costs	= \$0.00
Months of Service	x 12	Summary	
Total Eligible Recurring Costs	= \$22,380.00	Total Eligible Recurring Costs	\$22,380.00
		Total Eligible One-time Costs	+ \$0.00
		Pre-Discout Extended Eligible Line Item Cost	= \$22,380.00

Recipients of Services

BEN	Name
16046483	AAA ACADEMY

FRN Calculation for FRN #1799106494

Monthly Charges	
Total Monthly Recurring Charges	\$1,865.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$1,865.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$22,380.00

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$22,380.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$22,380.00
Discount Rate	90%
Funding Commitment Request	= \$20,142.00

[Funding Request for FRN #1799106546](#)

Funding Request Nickname: Hosted VoIP Service

Service Type: Voice

Agreement Information - Month-to-Month

Establishing FCC Form 470 170082132

Account Number

Was an FCC Form 470 posted for the product and/or services you are requesting? Yes

Service Provider Single Path LLC (SPN: 143030968)

How many bids were received for this contract? 2

When will the services end? June 30, 2018

What is the service start date? July 01, 2017

Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

Narrative School Phone Service

Line Item # 1799106546.001

Product and Service Details

Function Voice

Type of Connection Local/Long Distance Service

Cost Calculation for FRN Line Item # 1799106546.001

Monthly Cost	
Monthly Recurring Unit Cost	\$1,015.00
Monthly Recurring Unit Ineligible Costs	- \$0.00
Monthly Recurring Unit Eligible Costs	= \$1,015.00
Monthly Quantity	x 1
Total Monthly Eligible Recurring Costs	= \$1,015.00
Months of Service	x 12
Total Eligible Recurring Costs	= \$12,180.00

One-Time Cost	
One-time Unit Cost	\$0.00
One-time Ineligible Unit Costs	- \$0.00
One-time Eligible Unit Cost	= \$0.00
One-time Quantity	x 0
Total Eligible One-time Costs	= \$0.00
Summary	
Total Eligible Recurring Costs	\$12,180.00
Total Eligible One-time Costs	+ \$0.00
Pre-Discout Extended Eligible Line Item Cost	= \$12,180.00

Recipients of Services

BEN	Name
16046483	AAA ACADEMY

FRN Calculation for FRN #1799106546

Monthly Charges	
Total Monthly Recurring Charges	\$1,015.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$1,015.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$12,180.00

One-Time Charges	
Total One-Time Charges	\$0.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$0.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$12,180.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$12,180.00
Discount Rate	30%
Funding Commitment Request	= \$3,654.00

Connectivity Questions

Per Entity Basis Questions

Entity Name AAA ACADEMY **Entity Number** 16046483

What is the total bandwidth speed from this location (including non E-rate supported services)?

Download Speed 200.00 **Download Speed Units** Mbps

Upload Speed 200.00 **Upload Speed Units** Mbps

What is the predominant connection type coming to this location? Fiber **How sufficient is the quality of the Wi-Fi at this location?** Completely

What are your biggest barriers to having a robust internal network in your classrooms at this location? No barriers **If Other, please specify**

Certifications

I certify that the entities listed in this application are eligible for support because they are schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

I certify that the entity I represent or the entities listed on this application have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that the entities I represent or the entities listed on this application have secured access to all of the resources to pay the discounted charges for eligible services from funds to which access has been secured in the current funding year. I certify that the Billed Entity will pay the non-discount portion of the cost of the goods and services to the service provider(s).

Total Funding Summary

Below is a summary of the total line item costs on this FCC Form 471:

Summary	
Total funding year pre-discount eligible amount on this FCC Form 471	\$34,560.00
Total funding commitment request amount on this FCC Form 471	\$23,796.00
Total applicant non-discount share of the eligible amount	\$10,764.00
Total budgeted amount allocated to resources not eligible for E-rate support	\$50,000.00
Total amount necessary for the applicant to pay the non-discount share of eligible and any ineligible amounts	\$60,764.00
Are you receiving any of the funds directly from a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year?	No
Has a service provider listed on any of the FCC Forms 471 filed by this Billed Entity for this funding year assisted you in locating funds needed to pay your non-discounted share?	No

I certify an FCC Form 470 was posted and that any related RFP was made available for at least 28 days before considering all bids received and selecting a service provider. I certify that all bids submitted were carefully considered and the most cost-effective service offering was selected, with price being the primary factor considered, and is the most cost-effective means of meeting educational needs and technology goals.

I certify that the entity responsible for selecting the service provider(s) has reviewed all applicable FCC, state, and local procurement/competitive bidding requirements and that the entity or entities listed on this application have complied with them.

I certify that the services the applicant purchases at discounts provided by 47 U.S.C. § 254 will be used primarily for educational purposes, see 47 C.F.R. § 54.500 and will not be sold, resold or transferred in consideration for money or any other thing of value, except as permitted by the Commission's rules at 47 C.F.R. § 54.513. Additionally, I certify that the entity or entities listed on this application have not received anything of value or a promise of anything of value, as prohibited by the Commission's rules at 47 C.F.R. § 54.503(d), other than services and equipment sought by means of this form, from the service provider, or any representative or agent thereof or any consultant in connection with this request for services.

I certify that I and the entity(ies) I represent have complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. There are signed contracts or other legally binding agreements covering all of the services listed on this FCC Form 471 except for those services provided under non-contracted tariffed or month-to-month arrangements. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.

I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

I certify that I will retain required documents for a period of at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification) after the later of the last day of the applicable funding year or the service delivery deadline for the associated funding request. I acknowledge that I may be audited pursuant to participation in the schools and libraries program. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to USAC.

I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) listed on this application. I certify that I am authorized to submit this request on behalf of the eligible entity(ies) listed on this application, that I have examined this request, that all of the information on this form is true and correct to the best of my knowledge, that the entities that are receiving discounts pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.

I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities listed on this application, or any person associated in any way with my entity and/or the entities listed on this application, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.

I certify that if any of the Funding Requests on this FCC Form 471 are for discounts for products or services that contain both eligible and ineligible components, that I have allocated the eligible and ineligible components as required by the Commission's rules at 47 C.F.R. § 54.504.

Notice

Section 54.504 of the Federal Communications Commission's rules requires all schools and libraries ordering services that are eligible for and seeking universal service discounts to submit an application for such discounts by filing this Services Ordered and Certification Form (FCC Form 471) with the Universal Service Administrator. 47 C.F.R. § 54.504. The collection of information stems from the Commission's authority under Section 254 of the Communications Act of 1934, as amended. 47 U.S.C. § 254. The data in the report will be used to ensure that schools and libraries comply with the application requirements for universal service discounts contained in 47 C.F.R. § 54.504. Schools and libraries must file this form themselves or as part of a consortium. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The FCC is authorized under the Communications Act of 1934, as amended, to collect the information we request in this form. We will use the information you provide to determine whether approving your application for universal service discounts is in the public interest. If we believe there may be a violation or a potential violation of any applicable statute, regulation, rule or order, your application may be referred to the Federal, state, or local agency responsible for investigating, prosecuting, enforcing, or implementing the statute, rule, regulation or order. In certain cases, the information in your application for universal service discounts may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government is a party of a proceeding before the body or has an interest in the proceeding. In addition, consistent with the Communications Act of 1934, FCC regulations and orders, the Freedom of Information Act, 5 U.S.C. § 552, or other applicable law, information provided in or submitted with this form or in response to subsequent inquiries may be disclosed to the public. If you owe a past due debt to the Federal government, the information you provide may also be disclosed to the Department of the Treasury Financial Management Service, other Federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide the information to these agencies through the matching of computer records when authorized. If you do not provide the information we request on the form, the FCC or the Universal Service Administrator may delay processing of your application for universal service discounts or may return your application without action. The foregoing Notice is required by the Paperwork Reduction Act of 1995, Pub. L. No. 104-13, 44 U.S.C. § 3501, et seq. Public reporting burden for this collection of information is estimated to average 4.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, completing, and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the reporting burden to the Federal Communications Commission, Performance Evaluation and Records Management, Washington, DC 20554. We also will accept your comments via the email if you send them to PRA@FCC.gov. DO NOT SEND COMPLETED WORKSHEETS TO THESE ADDRESSES.

Authorized Person

Title:	Exec Dir	Name:	Freda McArthur
Phone:	708-206-0000	Email:	fredamcarthur@aaaacademy.org
Address:	13801 S. CHATHAM AVE BLUE ISLAND IL 60406	Employer:	Freda McArthur

Certified Timestamp

11-May-2017 14:54:54 EDT

ATTACHMENT C

2017 IA - #92932



Summary Associated FRNs Review Inquiries News Related Actions

In-Review

Outreach

Review Completed

Notification Issued

FCC Form 486 Form Details

View Status (+)

Funding Year 2017

Submitting Organization AAA ACADEMY (BEN: 16046483)

Created By Freda McArthur

Created On 4/19/2018 11:53 AM EDT

Billed Entity Information

AAA ACADEMY

13801 S. CHATHAM AVE

BLUE ISLAND, IL 60406

708-206-0000

Billed Entity Number: 16046483

FCC Registration Number: 0018090779

Applicant Type: School

Main Contact

Name Freda McArthur

Email fredamcarthur@aaaacademy.org

Phone Number 708-206-0000

Service Information

FRN Number	Application Number	FRN Nickname	Category of Service	SPIN	Service Provider	Actual Service Start Date
1799106494	171046688	Internet Access	Category 1	143030968	Single Path LLC	7/1/2017
1799106546	171046688	Hosted VoIP Service	Category 1	143030968	Single Path LLC	7/1/2017

Certifications

- ☐ The Funding Requests listed in this FCC Form 486 have been approved by USAC as shown in my Funding Commitment Decision Letter (FCDL). I have confirmed with the service provider(s) featured in those Funding Requests that these services will start on or before July 31 of the Funding Year.
- ☐ I am providing notification that, as of the date of the start of discounted services, I am unable to make the certifications required by the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), because my state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification(s) otherwise required. I certify that the schools or libraries represented in the Funding Request Number(s) on this FCC Form 486 will be brought into compliance with the CIPA requirements before the start of the Third Funding Year in which they apply for discounts.
- ☐ I certify that the services listed on this FCC Form 486 have been, are planned to be, or are being provided to all or some of the eligible entities identified in the FCC Form 471 application(s) cited above. I certify that there are signed contracts covering all of the services listed on this FCC Form 486 except for those services provided under tariff or on a month-to-month basis. I certify that I am authorized to submit this receipt of service confirmation on behalf of the above-named Billed Entity; that I have examined this request; and that, to the best of my knowledge, information, and belief, all statements of fact contained herein are true.
- ☐ I understand that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the services receive an appropriate share of benefits from those services. I recognize that I may be audited pursuant to this application and will retain for at least ten years (or whatever retention period is required by the rules in effect at the time of this certification) after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request any and all records, including FCC Forms 479 where required, and, if audited, will make such records available to the Administrator.
- ☐ I certify that as of the date of the start of discounted services: a. the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486 has (have) complied with the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l).
- ☐ I certify that as of the date of the start of discounted services: Pursuant to the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), the recipient(s) of service represented in the Funding Request Number(s) on this Form 486: (FOR SCHOOLS and FOR LIBRARIES IN THE FIRST FUNDING YEAR FOR PURPOSES OF CIPA) is (are) undertaking such actions, including any necessary procurement procedures, to comply with the requirements of CIPA for the next funding year, but has (have) not completed all requirements of CIPA for this funding year.
- ☐ I certify that as of the date of the start of discounted services: The Children's Internet Protection Act does not apply because the recipient(s) of service represented in the Funding Request Number(s) on this FCC Form 486 is (are) receiving discount services only for telecommunications services.
- ☐ I certify as the Billed Entity for the consortium that the only services that have been approved for discounts under the universal service support mechanism on behalf of eligible members of the consortium are telecommunications services, and therefore the requirements of the Children's Internet Protection Act, as codified at 47 U.S.C. § 254(h) and (l), do not apply.
- ☐ I certify as the Billed Entity for the consortium that I have collected duly completed and signed FCC Forms 479 from all eligible members of the consortium.
- ☐ I certify that some or all of the eligible consortium members checked FCC Form 479 Item 6d to seek a CIPA Waiver, and upon request from the Administrator I can provide this information.
- ☐ I certify that no eligible consortium members checked FCC Form 479 Item 6d to seek a CIPA Waiver.

FCC Notice Required By The Paperwork Reduction Act (OMB Control Number: 3060-0853)

Part 54 of the Federal Communications Commission's (FCC) rules authorize the FCC to collect the information requested in this form. Responses to the questions herein are required to obtain the benefits sought by this application. Failure to provide all requested information will delay processing or result in the form being returned without action. Information requested by this form will be available for public inspection. The information provided will be used to determine whether approving this request is in the public interest. We have estimated that each response to this collection of information will take 1 hour. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0853), Washington, DC 20554. We will also accept your comments via the Internet if you send them to pra@fcc.gov. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0853.

FCC Form 486

OMB Control No. 3060-0853

December 2013

Certification Details

Certified By Freda McArthur**Certified On** 4/19/2018 11:52 AM EDT[PRINT PREVIEW ✓](#)

ATTACHMENT D



FCC Form 486 Notification Letter

Freda McArthur
AAA ACADEMY
13801 S. CHATHAM AVE
BLUE ISLAND, IL 60406

7/7/2018

FUNDING YEAR 2017: 7/1/2017 - 6/30/2018
FCC Form 486 Application Number: 92932
Applicant's FCC Form 486 Nickname: 2017 IA

This letter is to notify you that the Universal Service Administrative Company (USAC) has received and accepted a certified FCC Form 486, Receipt of Service Confirmation Form, from you. Information about your commitment may have changed. Please review the [FCC Form 486 Notification Letter Report](#) to confirm the information you provided. This information is also being shared with the service provider(s) identified on each Funding Request Number (FRN).

A [guide](#) that provides a definition for each line of the letter report is available in the Reference Area of our website. Complete program information, including invoice deadlines, is also posted on our website. You may also contact our Client Service Bureau toll-free at (888) 203-8100, or by submitting a customer service case in the E-rate Productivity Center (EPC) by selecting "[Contact Us](#)" from the menu in the top right corner of your landing page and describing your issue.

Next steps

Discuss with your service provider whether you would like discounts on your bills or to pay your bills in full and be reimbursed for discounts.

- Applicants invoice USAC before the invoice deadline using the applicant invoice method [FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form] for reimbursements of discounts after paying the service provider bills in full.
- Service providers invoice USAC using the service provider invoice method [FCC Form 474, Service Provider Invoice (SPI) Form] after billing applicants for their non-discount portion.

Whichever method you choose, you must pay your non-discount portion, as stated in program rules. Program rules also require that participants maintain all documentation for at least 10 years after last day of the applicable funding year or the service delivery deadline for the funding request, whichever is later.

To appeal this service start date/funding commitment change decision

You may appeal the Service Start Date change(s) and/or funding commitment adjustment(s) indicated in this letter to USAC in EPC within 60 calendar days of the date of this letter. Failure



to meet this deadline will result in automatic dismissal of your appeal. You must file your appeal first with USAC because the FCC Form 486 deadline is a procedural deadline and not a program rule that requires a waiver by the FCC. If USAC denies the appeal, you may then appeal to the FCC.

To file an appeal with USAC, select "Appeal" from the menu in the top right corner of your landing page and then provide the requested information. USAC will reply to your appeal submissions to confirm receipt. Visit the [USAC Schools and Libraries website](#) for more information on submitting an appeal to USAC, including step-by-step instructions.

Schools and Libraries Division
Universal Service Administrative Co.



FCC Form 486 Notification Letter Report:

SPIN (Service Provider Identification Number):	143030968
Funding Request Number (FRN):	1799106494
FCC Form 471 Application Number (based on Funding Request Number):	171046688
Billed Entity Number (BEN):	16046483
Entity Name:	AAA ACADEMY
Approved Service Start Date (ASSD):	12/20/2017
Billing Account Number:	
Service Start Date Change Indicator:	N
Service Start Date Change Explanation:	120 DAY VIOLATION



FCC Form 486 Notification Letter Report:

SPIN (Service Provider Identification Number):	143030968
Funding Request Number (FRN):	1799106546
FCC Form 471 Application Number (based on Funding Request Number):	171046688
Billed Entity Number (BEN):	16046483
Entity Name:	AAA ACADEMY
Approved Service Start Date (ASSD):	12/20/2017
Billing Account Number:	
Service Start Date Change Indicator:	N
Service Start Date Change Explanation:	120 DAY VIOLATION

ATTACHMENT E

[Records](#) / [Appeals](#)

486 2017 - #123781

[Summary](#) [Associated FRNs](#) [News](#) [Related Actions](#)



Appeal Information

[View Status \(+\)](#)

Funding Year 2017

Submitting Organization [AAA ACADEMY \(BEN: 16046483\)](#)

Created By Freda McArthur

Created On 9/25/2018 6:18 AM EDT

Main Contact

Name Freda McArthur

Email fredamcarthur@aaaacademy.org

Phone Number 708-206-0000

Narrative

AAA Academy is appealing USAC 486 Decision to apply a 120 violation on our school. The deadline was missed, do to a change from using an Erate consultant, to in-house filing to save operational cost for the school. During this transition, EPC deadline notifications were not being received by the school, but instead to the former consultant and time action was not taken. Once we understood, we filed the correct 486's, then were notified of the 120 day violation which we are appealing.

Please see clear to help us receive these approved funds for service which are required to support the education of our students.

Thank you.

Appeal Details

Decision appealed by applicant FCC Form 486 Notification Letter

If you wish to modify or cancel your appeal, or, if you have any questions about your appeal, please contact the E-rate Program's Client Service Bureau (CSB) at (888) 203-8100.

[View Supporting Documentation \(+\)](#)